

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

LAYLA MOORE,

Plaintiff,

v.

CASE NO. 1:18-CV-363-LY

BAYLOR SCOTT & WHITE HEALTH,

Defendant.

JURY TRIAL REQUESTED

DEFENDANT'S AMENDED TRIAL EXHIBIT LIST

D's Exh. No.	Bates No.	Description	Offered	Admitted
1	S&W 000245-248	Equal Opportunity and Affirmative Action		
2	S&W 000250-252	Preventing Harassment in the Workplace		
3	S&W 000258-262	Attendance		
4	S&W 000264-267	Personal Conduct		
5	S&W 000256	Urgent Care Clinics Policy for Use of Personal Electronic Devices Acknowledgment Signed 8/22/16		
6	S&W 000255	Personal Conduct Policy Acknowledgment Signed 6/1/16		
7	S&W 000254	Attendance Policy Acknowledgment Signed 4/28/16		
8	S&W 000225	Cell Phone Policy Acknowledgment Signed 4/28/16		
9	S&W 000226	Cell Phones and Electronic Device Policy Acknowledgment Signed 4/28/16		
10	S&W 000231	Patient Confidentiality Policy Acknowledgment Signed 4/28/16		
11	S&W 000229	Personal Conduct Policy Acknowledgment Signed 4/28/16		
12	S&W 000006-23	BSWH Code of Conduct		

D's Exh. No.	Bates No.	Description	Offered	Admitted
13	S&W 000060	12/4/2016 ECF Aimee Ryce to Julie A. Macomber, Chris Payne, and M. Hill		
14	S&W 000069	12/5/2016 ECT Tammie Deaton from Marlene Hill		
15	S&W 000131-132	12/5/2016 ECF Billy Chandler to M. Hill; 12/5/16 ECF Hill to C. Payne forwarding same		
16	S&W 000133-134	12/5/16 T. Deaton ECT M. Hill 12/6/16 ECF M. Hill to C. Payne		
17	S&W 002279	12/12/16 ECF Catherine Devlin to M. Hill re patient #4265533 complaint of false documentation 12/13/16 ECF M. Hill to T. Deaton re counseling		
18	S&W 002280-2292	Redacted medical records of patient #4265533		
19	S&W 000050-52	Employee Counseling Form (verbal warning for attendance) (signed 12/13/16)		
20	S&W 000272-273	Employee Counseling Form (written warning for behavior/conduct) (signed 12/13/16)		
21	S&W 000042-43	12/13/16 Billy Chandler ECT Marlene Hill 12/13/16 M. Hill ECT T. Deaton		
22	Moore 000208-209	12/18/16 Text message from Moore to Hill		
23	S&W 000137	12/21/16 Layla R. Moore ECT Jana G. McCann (cc M. Hill); 12/21/16 M. Hill ECT Julie A. Macomber, C. Payne, and Shane R. Maxwell forwarding Moore EC		
24	S&W 000084-85	12/21/16 T. Deaton ECT M. Hill 12/21/16 M. Hill ECT T. Deaton 12/22/16 M. Hill ECT C. Payne re message exchange with T. Deaton		
25	S&W 000045	12/21/16 Curtis McDonald ECT M. Hill re patient #0968129 12/22/16 M. Hill ECT T. Deaton and C. Payne		
26	S&W 002275-2277	Redacted medical records of patient #0968129		

D's Exh. No.	Bates No.	Description	Offered	Admitted
27	S&W 000275-276	Employee Counseling Form (written warning for behavior/conduct) (signed 12/22/16)		
28	S&W 000083	12/22/16 (2:28pm) M. Hill ECT T. Deaton		
29	S&W 000039	12/22/16 (3:02 pm) D. Shaw ECT T. Deaton		
30	S&W 000143	12/22/16 (3:02 pm) T. Deaton ECT M. Hill 12/22/16 (3:08 pm) T. Deaton ECT M. Hill (cc C. Payne)		
31	S&W 000145	12/22/16 (3:09 pm) C. Payne ECT T. Deaton and M. Hill 12/22/16 (3:19 pm) T. Deaton ECT M. Hill and C. Payne		
32	S&W 000068	12/22/16 (3:17 pm) M. Hill ECT prn staff		
33	S&W 000148	12/22/16 (3:37 pm) M. Hill ECT T. Deaton and C. Payne		
34	S&W 000278	Employee Counseling Form (written warning for attendance) (12/22/16)		
35	Moore 000187-212	Text message exchange between M. Hill and Moore (9/11/16 – 12/22/16)		
36	Moore 000169-172	Text message exchange between M. Hill and Moore (12/22/16)		
37	Moore 000173-182	Text message exchange between C. Payne and Moore (12/22/16 – 12/27/16)		
38	S&W 000149	12/23/16 (8:57 am) M. Hill ECT T. Deaton and C. Payne		
39	S&W 000151-152	12/23/16 (9:04 am) T. Deaton ECT M. Hill and C. Payne 12/23/16 (9:09 am) T. Deaton ECT M. Hill and C. Payne		
40	S&W 000081	12/23/16 M. Hill ECT T. Deaton and C. Payne		
41	S&W 000080	12/24/16 M. Hill ECT T. Deaton and C. Payne		
42	S&W 000154	12/26/16 M. Hill ECT T. Deaton and C. Payne		
43	S&W 000951-952	12/26/16 T. Deaton ECT M. Hill and C. Payne		
44	S&W 000156	12/27/16 M. Hill ECT T. Deaton and C. Payne		

D's Exh. No.	Bates No.	Description	Offered	Admitted
45	S&W 000160	12/27/16 T. Deaton ECT M. Hill and C. Payne 12/27/16 M. Hill ECT T.Deaton		
46	S&W 000280-281	Employee Counseling Form (termination) (12/27/16)		
47	S&W 000166	12/27/16 T. Deaton ECT M. Hill and C. Payne		
48	S&W 000574-576	HR electronic notes		
49	S&W 000577-585	Productivity Report (Aug.-Dec. 2016)		
50	S&W 000586-588	CMA Job Description		
51	S&W 000589-597	Time punches		
52	S&W 000607-818	Moore Medical Records @ BSWH		
53	S&W 000888-912	Central Texas College records		
54	Produced by Plaintiff via drop box link on 11/26/18	Audio recording – Layla Moore call to People Place (Edited for admissibility)		
55	Produced by Plaintiff via drop box link on 11/26/18	Audio recording – Layla Moore visit to HR in Temple, TX (Edited for admissibility)		
56	S&W 000913	Marriage License		
57	S&W 000074-79	Timecard with notations		
58	S&W 000182	Resume		
59	Moore 000069-70	Charge of Discrimination (For Possible Impeachment Only)		
60	S&W 000362-401	Supplemental Health (Employment Records)		
61	S&W 000402-417	Fresenius (Employment Records)		
62	S&W 002293-2297)	ABC Medical (Employment Records)		
63	S&W 000819-865	Divorce Records – Jacolbi Don Brazwell and Layla Rousonda Brazwell		

D's Exh. No.	Bates No.	Description	Offered	Admitted
64	S&W 000866-882	Protective Order – Jamal Harewood		
65	S&W 000355-361	Moore medical records @ David Dickens, CNS-P/MH		
66	S&W 000317-326	Moore medical records @ Robert Brock, MD		
67	S&W 000564-573	Moore medical records @ Freedom Urgent Care		
68	S&W 000420-563	Moore medical records @ Seton		

Respectfully submitted,

/s/ Michael L. Scanes
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ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on the 6th day of August, 2019, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Western District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all counsel of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Michael L. Scanes
 Michael L. Scanes